

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**JANICE HARGROVE WARREN**

**PLAINTIFF**

**v.**

**Case No. 4:19-CV-00655-BSM**

**CHARLES MCNULTY, *et al.***

**DEFENDANTS**

**ORDER**

Defendants' motion in limine to exclude evidence of, and references to, punitive damages [Doc. No. 135] is denied. Motions in limine are disfavored, and punitive damages are permitted in employment discrimination cases brought under Title VII. 28 U.S.C. § 1981(a). Although it is not clear that there are sufficient facts to warrant punitive damages, Warren should be permitted to put on evidence in an attempt to meet her burden. *See Kolstad v. Am. Dental Ass'n.*, 527 U.S. 526 (1999).

IT IS SO ORDERED this 8th day of February, 2022.



---

UNITED STATES DISTRICT JUDGE